

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:21-CR-00715 HEA PLC
)
KEVIN SPARKS,)
)
Defendant.)

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, the United States Attorney for the Eastern District of Missouri, and Tracy L. Berry, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with violations of Title 18, United States Code, Sections: 1028(a)(3), possession of five or more identification documents; 1029(a)(3), possession of 15 or more unauthorized access devices; 1028A, aggravated identity theft; 2312, interstate transportation of a stolen vehicle; and 2314, interstate transportation of stolen property.
2. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant and defendant's history and characteristics which include defendant's prior criminal history and lack of ties to the community.

3. There is a serious risk that the defendant will flee as he has produced, possessed, and used counterfeit identification documents to evade law enforcement.

4. The defendant is an economic threat to the community as he has committed the charged fraud offenses as he has traveled throughout multiple states.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
UNITED STATES ATTORNEY

/s/ Tracy L. Berry

TRACY L. BERRY, #014753 TN
ASSISTANT UNITED STATES ATTORNEY
Thomas F. Eagleton Courthouse
111 South Tenth Street, 20th Floor
St. Louis, Missouri 63102
(314) 539-2200